

Response deadline: November 22, 2006
4:00 p.m. EST
Hearing date and time: November 30, 2006
10:00 a.m. EST

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|------------------------------|---|-------------------------|
| In re |) | Chapter 11 |
| |) | |
| DELPHI CORP. <i>et al.</i> , |) | Case No. 05-44481 (RDD) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |

**RE-NOTICE OF MOTION OF J.T. BATTENBURG III, ALAN DAWES, PAUL FREE,
JOHN BLAHNIK, MILAN BELANS, CATHERINE ROZANSKI, PAMELA GELLER,
PETER JANAK AND LAURA MARION FOR LIMITED RELIEF FROM THE
AUTOMATIC STAY, TO THE EXTENT APPLICABLE, TO PAY AND/OR ADVANCE
DEFENSE COSTS UNDER THE DEBTORS' INSURANCE POLICIES**

PLEASE TAKE NOTICE that J.T. Battenburg, III, Alan Dawes, Paul Free, John Blahnik, Milan Belans, Catherine Rozanski, Pamela Geller, Peter Janak and Laura Marion (collectively, "Movants") have filed a motion (the "Motion") in the Bankruptcy Court, seeking limited relief from the automatic stay, to the extent applicable, to have Movants' defense costs paid and/or advanced under the Debtors' insurance policies.

PLEASE TAKE FURTHER NOTICE that a hearing (the "Hearing") will be held in connection with the entry of an Order granting the relief requested in Movants' Motion and any further relief, on **November 30, 2006, at 10:00 a.m., prevailing Eastern Time**, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the "Court"), Alexander Hamilton Custom House, Room 610, One Bowling Green, New York, NY 10004.

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to either of the Motions shall be in writing, shall state with particularity the reasons for the objection or response, and shall be filed with the Court and shall be served upon counsel for Movants as listed below, so as to be *received* by **November 22, 2006 at 4 p.m.** Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

Dated: October 26, 2006 Respectfully submitted,

/s/ Richard A. Rossman

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